



PC125301 R.F.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

JAN 9 1995

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

**MEMORANDUM**

SUBJECT: ID# 000100-00722. Fenoxycarb in/on pastures with a 90-day deferred grazing restriction. Determination of Food/Nonfood Use. MRID# 433097-01 & -02. Barcode D207249. Case 004600. CBTS# 14358.

FROM: G.F. Kramer Ph.D., Chemist *[Signature]*  
Tolerance Petition Section III  
Chemistry Branch I, Tolerance Support  
Health Effects Division (7509C)

THRU: P.V. Errico, Section Head *[Signature]*  
Chemistry Branch I, Tolerance Support  
Health Effects Division (7509C)

TO: Marion Johnson, Product Manager  
Joseph Tavano, Team 10 Reviewer  
Registration Division (7505C)

Fenoxycarb (ethyl-[2-(p-phenoxyphenoxy) ethyl] carbamate) is the active ingredient of Logic Fire Ant Bait (Ciba Crop Protection). RD has asked CBTS to determine whether the addition of pastures with a 90-day deferred grazing restriction to the use sites for Logic would constitute a food/feed use. No permanent tolerances for fenoxycarb are currently established. However, CBTS has recently recommended in favor of a temporary tolerance of 0.10 ppm, expressed as parent only, for residues of fenoxycarb on pears (Memo, J. Morales 6/21/94, PP#0G3879). A petition for fenoxycarb tolerances in the citrus fruits group and the grass forage, fodder and hay crop group is in reject status (Memo, F. Griffith 12/11/89, PP#9F3572).

**CONCLUSIONS**

CBTS considers the use on pastures to be a food/feed use as the feed item (grass) is being directly treated with the pesticide.



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**DETAILED CONSIDERATIONS**

The registrant requests that use on pastures with a 90-day deferred grazing restriction be considered a nonfood/feed use. In support of this request, a summary of available residue data and a fenoxycarb goat metabolism study have been submitted (MRID# 433097-02). The fenoxycarb residues in grass forage and hay were <0.01 ppm 3 months after application. However, an expectation of minimal residues is not relevant to a food/nonfood use determination. The Agency definition of a food/feed use includes any use in an area where food/feed items are present or potentially present during use of the pesticide; i.e., a pasture. Tolerances must be established to cover potential residues. CBTS thus considers use in pastures to be a food/feed use. Also, CBTS considers grazing restrictions on pasture lands to be impractical in most circumstances. Tolerances for forage must thus be based on 0-day PHI data. Fenoxycarb residues of up to 0.24 ppm were observed one day after application (Memo, F. Griffith 12/11/89, PP#9F3572). If the registrant wishes to add this use to the Logic label, then the outstanding deficiencies in PP#9F3572 for fenoxycarb tolerances on the grass forage, fodder and hay group should be addressed.

cc: S.F., Kramer, circ., R.F., PP#9F3572, Nonfood Use File  
RDI: P.V. Errico (12/19/94), R.A. Loranger (1/6/95)  
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